

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 POLLUTION/SITUATION REPORT  
 Superior Cleaning Solutions Site - Removal Polrep  
 Initial Removal Polrep



US EPA RECORDS CENTER REGION 5



422923

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 Region V

**Subject:** POLREP #1  
 Initial  
 Superior Cleaning Solutions Site  
 C557  
 Dayton, OH  
 Latitude: 39.7806280 Longitude: -84.1866660

**To:** Sherry Fielding, EPA HQ  
 Jason El-Zein, U.S. EPA  
 Charlie Gebien, U.S. EPA  
 Carol Ropski, U.S. EPA  
 Jose Deleon, U.S. EPA  
 Valencia Darby, Department of Interior  
 Mark Durno, U.S. EPA  
 Victor Dvorak, U.S. EPA  
 Tracy Johnson, U.S. EPA  
 Rick Karl, U.S. EPA  
 Bill Ryczek, EPA 5  
 John Glover, U.S. EPA  
 John Maritote, U.S. EPA  
 USCG PolRep Distribution, USCG  
 Kevin Clouse, Ohio EPA  
 Dave Combs, Ohio EPA  
 Dale Farmer, Ohio EPA  
 Scott Shane, Ohio EPA  
 George Stroebel, Ohio EPA  
 Cathy Altman, Ohio EPA  
 Randy Watterworth, Ohio EPA  
 Michele Simmons, City of Dayton  
 Carson CocKayne, Dayton Fire Department  
 Andrew Steele, Dayton Fire Department  
 Jerry Bowling III, McCook Field Neighborhood Association

**From:** Steven Renninger, On-Scene Coordinator

**Date:** 1/6/2012

**Reporting Period:** January 3 through 6, 2012

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C557	<b>Contract Number:</b>	EP-S5-08-02
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	9/16/2011
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action



<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/3/2012	<b>Start Date:</b>	1/3/2012
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	OHN 000510610	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Ohio EPA
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

### 1.1.1 Incident Category

Time-Critical Removal Action

### 1.1.2 Site Description

The Chemical Management Company (aka Superior Cleaning Solutions) operated at the Superior Cleaning Solutions (SCS) Site at 1224 North Keowee Street, Dayton, OH most recently and sold industrial cleaning supplies. CMC specialized in chemical needs for restaurants, nursing homes, and the hospitality industry until approximately 2008.

On June 20, 2011, the Ohio Environmental Protection Agency (Ohio EPA) received an email from the McCook Field Neighborhood Association complaining about unsecured, abandoned drums located within overgrown trees and brush on the southside of the site.

On June 22, 2011, Ohio EPA investigated the site and observed numerous unsecured drums outside of the facility. Ohio EPA secured the fencing at the site to prevent access to the numerous drums until the formation of a follow-up strategy.

On June 28, 2011, Ohio EPA and the Dayton Fire Department (DFD) conducted an investigation at the Site and observed numerous abandoned drums and containers having corrosive and flammable labels. Flammable and corrosive chemicals were found in excess of the Dayton Fire Code Exempt storage amounts.

#### 1.1.2.1 Location

The SCS Site is a commercial property located at 1224 North Keowee Street in Dayton, Ohio. The geographical coordinates for the site are latitude 39° 46' 50.2" North and longitude 84° 11' 12.9" West. The site is abandoned and was historically used as a commercial chemical distribution and processing building. The previous occupant of the site was a chemical company called CMC (aka Superior Cleaning Solutions). The site is bordered to the north by a used car dealer, Deals for Wheels; to the east by residential properties; to the south by a commercial property, Boeckman Meats; and to the west by North Keowee Street.

Commercial businesses are located within 20 feet of the Site and the closest residences are located 50 feet east of the site.

#### 1.1.2.2 Description of Threat

Drums and containers containing various corrosive and flammable liquids such as sodium hydroxide, fluorosilicic acid and xylene chemicals as well as numerous other unknown chemical drums are located inside the building. In addition, there is a wood gate at the rear of the property that encloses numerous unsecured 55-gallon and 35-gallon drums along the south side of the site building. The area where the drums are located is heavily overgrown with trees and brush.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On August 3, 2011, U.S. EPA OSC Steve Renninger and U.S. EPA's START contractor mobilized to the SCS Site to conduct a removal Site Assessment.

Activities performed during the Site Assessment included:

- Documenting Site conditions;
- Air monitoring;
- Collecting samples from drums and containers; and



- Submitting the samples for commercial laboratory analysis.

During the site assessment, approximately 160 55-gallon drums, 10 totes and 200 small containers (35-gallons or less) were documented abandoned on Site. Many of the drums and containers contained labels such as "Flammable Liquid", "Corrosive", "Hydrochloric Acid", "Sodium Hydroxide", "Fluorosilicic Acid", "Xylene", and "Caustic Soda." Numerous drums were in poor condition, bulging and leaking.

U.S. EPA collected 16 liquid samples during its Site Assessment. The samples were submitted for commercial laboratory analysis. Analytical results from liquid samples SCS-003, SCS-004, SCS-005, SCS-015, SCS-024 and SCS-025 documented liquid having flash points less than 140°F, which, according to 40 C.F.R. 261.21, verifies the characteristic of a hazardous waste for ignitability (D001).

Analytical results from liquid samples SCS-002, SCS-006, SCS-012, SCS-020 and SCS-022 documented pH levels less than 2.0 standard units, and analytical results from liquid samples SCS-010, SCS-013 and SCS-021 documented pH levels greater than 12.5 standard units. All eight liquid sample results, according to 40 C.F.R. 261.22, verify the characteristic of a hazardous waste for corrosivity (D002).

Abandoned drums, totes and containers are present at the abandoned Site. Based on the proximity of commercial and residential properties, the drums and containers pose a potential direct contact threat to the public and a potential threat of release to the environment.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

In a letter dated July 8, 2011, the DFD formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a time-critical removal action. According to the DFD, "an inspection was conducted at the Site on June 28, 2011, and the Site appears to contain many abandoned materials that need to be evaluated prior to disposal. From inspection on the labels on the chemicals, it appears that flammable and corrosive materials are being stored in excess of the Dayton Fire Code allowable quantities for inside storage. Throughout the facility there are drums of process fluids that need proper characterization and disposal from the facility. Outside the facility are abandoned drums that will require proper characterization and disposal from the facility."

In a letter dated August 10, 2011, Ohio EPA formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a time-critical removal action. Ohio EPA noted numerous abandoned drums and containers having flammable and corrosive labels were located inside and outside of the facility.

On November 16, 2011, U.S. EPA finalized the Emergency Contingency Plan. A copy of the finalized Emergency Contingency Plan can be found in the Documents Section of the site website [www.epaos.org/superiorcleaningsite](http://www.epaos.org/superiorcleaningsite).

On September 16, 2011, the Director of U.S. EPA's Superfund Division approved an Action Memorandum approving funding for a time-critical removal action at the SCS Site.

On January 3, 2012, U.S. EPA, START and ERRS mobilized to the site to begin time-critical removal activities.

#### **2.1.2 Response Actions to Date**

##### Week of January 2, 2012

On January 3, 2012, U.S. EPA, START and ERRS mobilized to the SCS Site to begin time-critical removal activities. Office space was rented for the U.S. EPA Command Post approximately 1/4-mile south of the Site at 903 North Keowee Street.

ERRS rented a wood chipper and cleared out the overgrown trees and brush located around the facility building. The drums and containers which were located outside of the building were segregated and staged inside of the site building.



ERRS staged all drums and containers in preparation for sampling beginning the week of January 16, 2012.

A 20-yard rolloff box was mobilized and filled with non-hazardous debris from within the building. On January 6, 2012, the rolloff box was transported for off-site disposal to Stony Hollow Landfill, Dayton, Ohio.

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fund the removal action.

### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-hazardous debris	Solid	1 rolloff box (20-yd <sup>3</sup> )		Landfill	Stony Hollow Landfill Dayton, OH

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

The U.S. EPA-funded removal action was initiated on January 3, 2012. Removal activities on Site will include:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Inventory, sample, and perform hazard characterization on all substances contained in drums, containers and totes;
4. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal; and
5. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).

#### 2.2.1.1 Planned Response Activities

See above. No site work scheduled for the week of January 9, 2012.

#### 2.2.1.2 Next Steps

- 1) Sample all drums, totes and containers on site (week of Jan 16, 2012).
- 2) U.S. EPA START contractor to hazard categorize all drum and container samples.
- 3) Place all non-hazardous debris into a rolloff box for off-site disposal.
- 4) Begin cutting or crushing empty drums and containers.
- 5) Develop disposal wastestreams and generate waste disposal samples for disposal bid procurement.
- 6) Schedule transportation and disposal of site waste (anticipated Feb 2012).

### 2.2.2 Issues

None.



**2.3 Logistics Section**

Not applicable.

**2.4 Finance Section****Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$114,953.00	\$8,000.00	\$106,953.00	93.04%
TAT/START	\$30,000.00	\$3,000.00	\$27,000.00	90.00%
<b>Intramural Costs</b>				
USEPA - Direct	\$30,000.00	\$3,000.00	\$27,000.00	90.00%
<b>Total Site Costs</b>	<b>\$174,953.00</b>	<b>\$14,000.00</b>	<b>\$160,953.00</b>	<b>92.00%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

**2.5 Other Command Staff****2.5.1 Safety Officer**

The Health & Safety Plan was approved and signed by all site personnel.

**2.5.2 Liaison Officer**

Not applicable.

**2.5.3 Information Officer**

Not applicable.

**3. Participating Entities****3.1 Unified Command**

Not applicable.

**3.2 Cooperating Agencies**

Ohio EPA  
Dayton Fire Department

**4. Personnel On Site**

U.S. EPA OSC -- 1  
WESTON START - 1  
ERRS (EQM and Inland Waters of Ohio) - 5



**5. Definition of Terms**

Not applicable.

**6. Additional sources of information**

**6.1 Internet location of additional information/report**

The "Documents" link on the site website contains information such as U.S. EPA's Action Memorandum and U.S. EPA's Site Assessment Report.

**6.2 Reporting Schedule**

The next POLREP will be issued at the beginning of February 2012.

**7. Situational Reference Materials**

Not applicable.











